

Final Draft
03-06-03
Revised
02-08-05
12-06-12
07-03-13
04-14-15

PHASE II
STORM WATER MANAGEMENT PROGRAM PLAN

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Section A. Executive Summary.

Deerfield Township, Warren County, Ohio is required to submit a storm water management plan (SWMP) in accordance with 40 CFR Part 122.32 and Ohio law. This document outlines the steps Deerfield Township is taking to develop, implement and enforce a SWMP designed to reduce the discharge of pollutants to the maximum extent practicable, to protect water quality, and to satisfy the appropriate requirements of the Clean Water Act (CWA) in accordance with the Ohio EPA National Pollutant Discharge Elimination System (NPDES) Phase II Program. This SWMP addresses the six minimum control measures as required by state and federal regulations. The Notice of Intent (NOI) and the original SWMP were submitted before March 10, 2003.

Section B. Program Background.

Deerfield Township is the most urbanized township in Warren County, Ohio. The 16.5 square mile township is home to 37,000 residents. Most townships in Ohio rely solely on County agencies to maintain compliance with Ohio EPA's NPDES Phase II Permit and address storm water issues. Deerfield Township is highly developed and contains five major tributaries to the Little Miami River which establishes its eastern boundary. The area faces unique storm water concerns which set it apart from most other Warren County townships. In 2003 it was determined that Deerfield Township would form a regional storm water district under Ohio Revised Code 6119 to take responsibility for the Township's compliance with Ohio EPA's permit and to address regional storm water concerns.

The Deerfield Regional Storm Water District (DRSWD) was formed at the end of 2003 and the DRSWD Board convened in March of 2004. DRSWD has developed this SWMP to identify the activities and procedures the District implements to meet its goals. Many of these activities are mandated by CWA regulations or are otherwise supporting the Township's NPDES Phase II permit. Other activities, while not mandated, are necessary to advance the District's goals of addressing storm water concerns in Deerfield Township.

DRSWD works with partner agencies at Deerfield Township and Warren County to implement the Township's SWMP. An organizational table which identifies partner agencies responsible for implementing activities associated with each of the program's minimum control measures can be found in Appendix A. These Partner Agencies communicate regularly with the DRSWD and provide progress reports at the end of each year.

While this SWMP is the official management plan for the program, DRSWD and its partners keep their websites up-to-date as a resource for its residents and businesses.

DRSWD:
www.deerfieldstormwater.com

Deerfield Township:
<http://www.deerfieldtp.com>

Warren County Engineer's Office:
<http://www.wceo.us>

Warren County Soil and Water Conservation District:
<http://www.co.warren.oh.us/warrenswcd/default.aspx>

Warren County Combined Health District:
<http://www.wcchd.com>

Section C. Legal Authority.

The Township's legal counsel has advised that Ohio townships lack the legal authority to implement various aspects of the six minimum control measures. Consequently, Deerfield Township is incapable of fully satisfying the Phase II requirements without the assistance of other entities. The DRSWD is charged with administering and coordinating the majority of this SWMP, but it also shares responsibilities with Deerfield Township, Warren County and the Warren County Soil & Water Conservation District, and others, as needed, with the goal of carrying out the SWMP in the most efficient manner possible.

1. Permit Coverage Area.

The SWMP covers all properties owned by the Deerfield Township Board of Trustees or maintained by Deerfield Township and that lie within an "Urbanized Area" as defined by the U.S. Census Bureau. In general, this includes all legal road rights of way maintained by the Township and all Township owned facilities. A map of the affected road rights of way and a listing of the affected facilities are attached as Appendix B.

2. Reporting Requirements.

Deerfield Township will submit its required report annually. The report will include the status of compliance with the permit conditions, and assessment of

the appropriateness of the Best Management Practices (BMPs) and progress toward achieving the measurable goals for each of the six minimum control measures. A summary of the activities Deerfield Township will undertake during the reporting cycle and any changes to BMPs or measurable goals and all relevant data obtained during the reporting period.

Section D. Storm Water Management Program Plan.

The Plan outlines the six minimum control measures which are expected to result in reductions in pollutants discharged in Deerfield Township, Ohio. The six minimum control measures will address the water quality pollutants that are identified during the planning process. Each minimum control measure will have four stages: planning, programming, implementation, and maintenance. During the planning stage, water quality pollutants were identified, BMPs were selected and programs and program materials were developed. During the Programming Stage, the programs developed during the planning stage will be scheduled. Finally, the programs will be implemented and once they are fully implemented, maintenance procedures will be adopted.

The six minimum controls are:

- (1) Public education/outreach;
- (2) Public participation/involvement;
- (3) Illicit discharge detection/elimination;
- (4) Construction site runoff control;
- (5) Post construction runoff control;
- (6) Pollution prevention/good housekeeping.

Deerfield Township is completely contained in the Little Miami River Lower Watershed. The DRSWD has reviewed and evaluated the recommendations provided in the Little Miami River Lower Watershed Total Maximum Daily Load (TMDL) report approved by U.S. EPA in the March of 2011. The DRSWD's Storm Water Management Program Plan includes several program components that have been implemented to address sources of impairment to aquatic life and recreation, including Construction Site and Post Construction Runoff Control measures to mitigate sedimentation and siltation and an Illicit Discharge Detection and Elimination plan to address and prevent illicit connections and discharges to the Township's separate storm sewer system.

1. Public Education and Outreach.

Rationale Statement: The DRSWD will work in cooperation with the Warren County Soil and Water Conservation District (WCSWCD) to provide education and outreach to at least 50% of the Township's population over each permit term,

using at least one mechanism to target at least five different storm water themes. The WCSWCD staff will serve as the lead agency on this Minimum Control Measure (MCM). The DRSWD has in past years contributed to the Regional Storm Water Collaborative to provide further outreach to the Township's population.

The DRSWD and WCSWCD will focus its public education and outreach efforts on the following target audiences:

- Township Residents
- Students
- Developers
- Township Businesses

The DRSWD and WCSWCD will provide education and outreach on the following messages:

- Watershed Awareness
- Nutrifcation
- Sedimentation
- Hydromodification
- Household Hazardous Waste

The DRSWD and WCSWCD will provide education and outreach utilizing the following mechanisms:

- school presentations
- material distribution at local events
- regular WCSWCD and DRSWD meetings
- television-based outreach
- web-based outreach
- direct response to calls to the Township's storm water hotline
- storm drain labeling
- stream signage

The DRSWD and WCSWCD will evaluate the public education and outreach BMPs annually during the development of the Township's Annual Report.

Minimum Measure Objective. Implement a public education and outreach program to distribute educational materials to the community or conduct equivalent outreach activities about the impacts of storm water discharges and steps the public can take to reduce pollutants in runoff.

BMP 1.1: Storm Water Material Distribution Mechanisms.

Measurable Goals: Reach at least 20% of the Township's population utilizing at least two (2) public outreach mechanisms each program year.

The DRSWD maintains an informational website for web-based outreach. This website also contains program policy information, program documents, public meeting announcements and updates the District's progress toward addressing storm water issues. The DRSWD website can be accessed at www.deerfieldstormwater.com.

The DRSWD relies on the WCSWCD to provide school presentations, distribute material at local events and organize public involvement activities. The WCSWCD strives to reach as many school aged children as possible with classroom presentations that are relevant to the curriculum standards for water quality. Networking with local educators is done by distributing a brochure of programs offered by the WCSWCD from which teachers and schools can schedule programs (Appendix E). In addition, printed materials such as brochures are distributed out of the WCSWCD office, at district booths at fairs and festivals, and are available for printing on websites, all of which are tracked for reporting purposes.

The DRSWD relies on its partnership with the Regional Storm Water Collaborative to provide television-based outreach as well as to assist in providing web-based outreach. This technique educates the public about potential sources of pollution, equips them to prevent and report pollution effectively, and offers other valuable storm water messages. Television spots aired are reported by local stations on a monthly basis. Website hits can be tallied upon request and are counted for an annual total each year. Social media affords the ability to track very specific numbers such as views, comments, and likes for posts while reaching a large and local audience.

BMP 1.2: Storm Water Program Support Mechanisms.

Measurable Goals: Maintain DRSWD website and upload reports to the website for public viewing. Continue to participate in regional partnerships. Maintain a storm water hotline for residents to call and report storm water pollution violations and return calls within three (3) days of receiving messages.

The DRSWD provides information to the public at its regular Board Meetings, maintains partnerships with its partner agencies and the

Regional Stormwater Collaboration and provides direct responses to calls to the Township's storm water hotline.

The DRSWD relies on the WCSWCD to provide information to the public at its regular meetings.

BMP 1.3: MS4 Identification Measures.

Measureable Goals: Continue to provide drain stenciling or tagging on new storm inlets within the Township. Maintain signage at strategic crossing locations along all streams throughout the Township, inspecting each crossing once each program year.

The DRSWD inspects and maintains stream signage throughout the Township.

The DRSWD relies on the WCSWCD to facilitate storm drain labeling.

BMP 1.4: Evaluate Public Education and Outreach BMPs.

Measurable Goals: Confirm whether the measurable goals associated with Public Education and Outreach BMPs are relevant, quantitative and achievable at the end of each program year.

The DRSWD evaluates the SWMP BMPs and measurable goals while preparing the annual report each program year.

2. Public Participation/Involvement.

Rationale Statement: The DRSWD continues to work in cooperation with the WCSWCD to support at least five public participation and involvement activities over the permit term. The WCSWCD staff will serve as the lead agency on this MCM.

The DRSWD and WCSWCD will focus its public education and outreach efforts on the following target audiences:

- Township Residents
- Home Owners Associations
- Township Businesses

The DRSWD and WCSWCD will provide public participation and involvement opportunities utilizing the following mechanisms:

- hold regular WCSWCD and DRSWD meetings
- address private property storm water issues within the Township
- implement stream clean-up events with educational components
- advertise public involvement opportunities through outreach mechanisms

The DRSWD and WCSWCD will evaluate the Public Involvement and Participation BMPs annually during the development of the Township's Annual Report. This evaluation could include revisions or updates to the SWMP. WCSWCD will continue to track the number of residents attending public meetings and participating in involvement activities.

Minimum Measure Objective. Involve stake holder groups, including local governments, businesses, and citizens, in making decisions about storm water management priorities and programs.

BMP 2.1: Public Involvement Mechanisms.

Measurable Goals: Hold monthly meetings to educate the public of local storm water issues and provide a forum for public input. Address private property storm water issues within the Township in accordance with new Regulations adopted in late 2010.

The DRSWD holds monthly meetings and administers a program to catalog, rank and address private property storm water issues.

BMP 2.2: Public Participation Mechanisms.

Measurable Goals: Work with community groups to support one public participation activity each year. Publicize through at least one public education and outreach mechanism.

The DRSWD relies on the WCSWCD to implement a public participation activity each year as well as advertise the event in one of the District's outreach mechanisms. The activities hosted for public participation include such things as stream clean-ups, rain barrel workshops, and other activities as requested.

BMP 2.3: Evaluate Public Participation and Involvement BMPs.

Measurable Goals: Confirm whether the measurable goals associated with Public Participation and Involvement BMPs are relevant, quantitative and achievable at the end of each program year.

The DRSWD evaluates the SWMP BMPs and measurable goals while preparing the annual report each program year.

3. Illicit Discharge Detection and Elimination.

Rationale Statement: The DRSWD continues to work to implement a storm water illicit discharge detection and elimination program including an initial dry-weather screening of all storm water outfalls over the permit term and establishing priorities and specific long-term system-wide surveillance of the Township's MS4. The DRSWD will work in cooperation with the Warren County Engineer's Office (WCEO) to develop and update annually a comprehensive storm sewer system map. The DRSWD will serve as the lead agency on this MCM.

The DRSWD has decided to use information gathered as part of the initial dry weather screening effort performed in 2006 and 2007 to identify areas of potential illicit discharges, and to perform follow-up inspections in these areas. The DRSWD has decided to establish a procedure to report all relevant illicit discharges identified to the Warren County Combined Health District (WCCHD) or other applicable enforcement agency. The DRSWD supports the development of a system-wide storm sewer map to assist in identifying the sources of illicit discharges as they are discovered.

The DRSWD relies on WCCHD, which is the regulatory agency for illicit discharges in the Township, to regularly track and inspect HSTSS as part of their Environmental Health Program. The District will track complaints and forward information about illicit discharges as it becomes available.

The DRSWD will evaluate the Illicit Discharge Detection and Elimination BMPs annually during the development of the Township's Annual Report. This evaluation could include revisions or updates to the SWMP.

Minimum Measure Objective. Develop a comprehensive map of the storm drain system, establish and carry out procedures to identify and remove illicit discharges, establish legal authority for enforcement actions, and encourage public education and involvement in eliminating illicit discharges. (Illicit discharges are defined as any discharge not entirely composed of storm water and are considered "illicit" because MS4s are not designed to accept, process, or discharge such non-storm water waste.)

BMP 3.1: Ordinance or Other Regulatory Mechanism.

Measurable Goal. Report all relevant illicit discharges to the WCCHD or other applicable enforcement agency.

Those participating agencies without legal authority to take enforcement action against the sources of illicit discharges are prepared to forward information to those agencies with legal authority.

Illicit discharges are prohibited by the Ohio Revised Code Chapter 3718, Ohio Administrative Code Chapter 3701-29, and by the "Warren County Combined Health District Sewage Treatment System Regulations."

BMP 3.2: Develop a storm sewer system map.

Measurable Goal. Develop a storm sewer map showing all pipes, structures, outfalls, detention basins, and the names and locations of surface water of the state within the Township within the permit term. The District will complete this goal on the following schedule: 2005 – 30%, 2006 – 35%, 2007 – 35%. Develop and prioritize for inspection a list of outfalls for follow-up inspections.

The storm sewer map is 80% completed and is being updated and maintained by the Warren County Engineer's Office. The completed map will be used as a resource for ongoing illicit discharge detection and elimination.

The DRSWD relies on WCEO to update and maintain the storm sewer system mapping for Deerfield Township.

BMP 3.3: Create a map of the home sewage treatment systems.

Measurable Goal. Maintain an up-to-date Home Sewage Treatment System (HSTS) map. The District will complete the mapping on the following schedule: 2005 – 30%, 2006 – 35%, 2007 – 35%. After this mapping is complete, the District will be better able to identify problems with older sanitary sewer lines and will work with the WCCHD on a case-by-case basis to correct these problems.

The HSTS map has been completed and will be used as a resource for ongoing illicit discharge detection and elimination.

The DRSWD relies on WCEO and WCHD to update and maintain the HSTS mapping for Deerfield Township.

BMP 3.4: IDDE Plan.

Measurable Goals: Confirm whether the measurable goals associated with Illicit Discharge Detection and Elimination BMPs are relevant, quantitative and achievable at the end of each program year.

The DRSWD evaluates the SWMP BMPs and measurable goals while preparing the annual report each program year.

BMP 3.5: Dry-Weather Screening of Outfalls.

Measurable Goal. Continue to identify non-storm discharges to the Township's MS4 throughout the five-year permit term. Cooperate with appropriate agencies to eliminate all identified illicit discharges. Maintain a hotline for citizens to report illegal dumping and suspicious discharges. Provide hotline phone number to residents in at least one education and outreach publication.

Those participating agencies without legal authority to take enforcement action against the sources of illicit discharges are prepared to forward information to those agencies with legal authority.

The DRSWD performed the initial dry-weather screening and is responsible for performing follow-up inspections. The DRSWD also maintains a storm water hotline for citizens to report illegal dumping and suspicious discharges. The DRSWD provides the hotline phone number on its website.

The DRSWD relies on WCHD and other applicable enforcement agencies to take enforcement action against the sources of illicit discharges to the Township's MS4.

4. Construction Site Runoff Control.

Rationale Statement: The DRSWD works in cooperation with WCSWCD to maintain a construction site storm water control program including a pre-construction storm water pollution plan review of all projects which include construction activities that result in a land disturbance of greater than or equal to one acre, initial site inspections, and monthly follow-up inspections. The WCSWCD will serve as the lead agency on this MCM – significant assistance from

WCEO is also anticipated with regard to post-construction stormwater plan reviews.

Warren County's Construction Site Runoff Control program comes directly from the "Warren County Erosion and Sediment Control Regulations" (Appendix G) adopted by the Warren County Commissioners November 16th 2006. These regulations were written to comply with the Ohio EPA General Construction Permit in effect at the time of adoption. These regulations are enforced by the equivalent of two full-time staff people at the WCSWCD.

The DRSWD, WCSWCD and WCEO will perform reviews of all applicable site plans each program year. WCSWCD reviews the storm water pollution prevention plans for erosion and sediment control on all applicable sites while the WCEO reviews storm water calculations and post-construction BMP plans as described in section five of this plan. Inspections are done monthly on active sites using a web-based inspection form (Appendix I) which generates a maintenance letter based on how the inspector fills out the form (Appendix J).

Minimum Measure Objective. Develop, implement, and enforce a program to reduce pollutants in storm water runoff to the small MS4 from construction activities that result in a land disturbance of one (1) or more acres.

BMP 4.1: Ordinance or Other Regulatory Mechanism.

Measurable Goal. Support and enforce regulations for all required projects.

The DRSWD relies on WCSWCD to support and enforce regulations on all required projects.

BMP 4.2: Sediment and Erosion Control Requirements.

Measurable Goal. Review, support and enforce sediment and erosion control requirements. Incorporate current version of Ohio EPA's Construction General Permit into local regulations.

The DRSWD relies on WCSWCD to review, support and enforce sediment and erosion control requirements.

BMP 4.3: Complaint Process.

Measurable Goal. Respond to all complaints within one week of receipt.

The DRSWD relies on WCSWCD to respond to all complaints.

BMP 4.4: Site Plan Review Procedures.

Measurable Goal. Review all applicable site plans.

The DRSWD relies on WCEO and WCSWCD to review all applicable site plans each program year.

BMP 4.5: Site Inspections Procedures.

Measurable Goal. Continue to comply with inspection procedures outlined within the Warren County Erosion and Sediment Control Regulations.

The DRSWD relies on WCSWCD to perform erosion and sediment control site inspections.

BMP 4.6: Enforcement Procedures.

Measurable Goal. Continue to implement escalating enforcement actions where projects violate the rules and regulations.

The DRSWD relies on WCSWCD to take enforcement actions against projects violating the rules and regulations.

5. Post Construction Runoff Control.

Rationale Statement: The DRSWD will continue to work in cooperation with WCEO to maintain a post-construction runoff control program including a pre-construction storm water pollution prevention plan review of all projects which include post-construction controls, inspection of post-construction controls, and the development of ongoing long-term operation and maintenance plans. The WCEO will serve as the lead agency on this MCM.

The WCEO currently administers the post-construction storm water management program for Deerfield Township. This program addresses storm water runoff in new development and redevelopment by requiring storm water retention or detention in accordance with the standards set forth by the regulations, "Warren

County, Ohio Rules and Regulations for the Design of Sewer and Stormwater Management Systems" (Appendix K).

Minimum Control Objective. Develop, implement, and enforce a program to address storm water runoff from new development and re-development projects that disturb one (1) or more acres of land.

BMP 5.1: Ordinance or Other Regulatory Mechanism.

Measurable Goal. Utilize the County's Stormwater Management Systems Regulations to require post-construction BMPs per the applicable design criteria set forth in those regulations.

The DRSWD relies on WCEO to implement and enforce these regulations.

BMP 5.2: Post-Construction Requirements.

Measurable Goal. Maintain compliance with the Warren County Rules and Regulations for the Design of Storm Sewer and Stormwater Management Systems.

The DRSWD relies on WCEO and WCSWCD to implement and enforce these regulations.

BMP 5.3: Site Plan Review Procedures.

Measurable Goal. Implement the newly developed pre- and post-development release rate tables and hydrographs during the site plan reviews of all applicable sites within the Township.

The DRSWD developed pre- and post-development release rate tables and hydrographs as part of the Township's storm water master plan for application in site plan reviews. These release rate tables are available in Appendix C.

The DRSWD relies on WCEO to perform site plan reviews. The post-construction BMPs that are approved for use come from the State's approved list and are described throughout the current Ohio EPA Construction General Permit. Further specifications are included in the Ohio Department of Natural Resources *Rainwater and Land Development* manual.

BMP 5.4: Site Inspection Procedures.

Measurable Goal. Perform inspections on all applicable sites.

The DRSWD relies on WCSWCD to perform site inspections on post-construction BMPs and issue maintenance need letters. The WCSWCD in cooperation with the WCEO inspects all post-construction storm water BMPs on a biennial basis, or yearly if the BMP is designed to treat storm water quality. The inspection history and location of all BMPs is managed in a GIS database that includes photographs of the BMPs, as-built information, and recommended maintenance comments.

BMP 5.5: Enforcement Procedures.

Measurable Goal. Enforce the Rules and Regulations as applicable.

The DRSWD relies on WCEO to enforce the rules and regulations for post-construction standards during the plan review stage, throughout construction, and prior to releasing a project's bond. WCSWCD is relied upon to issue letters of enforcement after inspection of BMPs. Following the inspections letters are generated and sent to property owners for all BMPs that require maintenance (Appendix L).

BMP 5.6: Long-Term O&M Plans and Agreements.

Measurable Goal. Develop long-term O&M plans for all applicable sites.

Long term operation and maintenance of the storm water system is addressed in the Warren County Subdivision Regulations whereby, "The developer of any subdivision with a storm water system must provide the Regional Planning Commission with written evidence of a perpetual maintenance agreement and the manner in which it is to be funded (pg. 48). In addition, as-builts are required for all components of the storm water system before the project's bond is released from the WCEO.

6. Pollution Prevention/Good Housekeeping.

Rationale Statement: The DRSWD will continue to work in cooperation with Deerfield Township to maintain a pollution prevention and good housekeeping program including an annual employee training effort. The Township will serve as the lead agency on this MCM.

The DRSWD and the Township developed Storm Water Pollution Prevention Plans (SWPPPs) for Township facilities and implemented a training program to educate Township employees in good housekeeping practices. The DRSWD and the Township will continue to track waste disposal, road salt, pesticide and herbicide usage and fertilizer usage. The Township does not own or operate any facility subject to the Ohio EPA Industrial Storm Water Permit.

Minimum Measure Objective. Develop and implement an operation and maintenance program that includes a training component and has the ultimate goal of preventing pollutant runoff from municipal operations.

BMP 6.1: Training program for public employees of the Township.

Measurable Goals. Provide storm water management education to 100% of Public Works Employees.

The DRSWD relies on the Township to educate its employees.

BMP 6.2: Develop a pollution prevention plan for facilities subject to the program.

Measurable Goals. Implement inspections procedures for Township facilities and track waste disposal.

The DRSWD relies on the Township to inspect its facilities.

BMP 6.3: MS4 Maintenance.

Measurable Goals. Maintain the Township's MS4 within the right-of-way.

The DRSWD relies on the Township and Warren County to maintain infrastructure within their respective right-of-way.

BMP 6.4: Incorporate the use of road salt storage control and implement road salt alternatives for roadway de-icing.

Measurable Goals. Work to minimize salt usage while maintaining road safety.

The DRSWD relies on the Township to oversee road salt usage.

BMP 6.5: Pesticide and Herbicide Usage.

Measurable Goals. Minimize pesticide and herbicide application.

The DRSWD relies on the Township to oversee pesticide and herbicide application.

BMP 6.6: Fertilizer Usage.

Measurable Goals. Minimize fertilizer usage at Township Parks.

The DRSWD relies on the Township to oversee fertilizer usage.

BMP 6.7: Street Sweeping.

Measurable Goals. Track amount of material collected and disposed of for each street sweeping event.

The DRSWD relies on the Township to oversee street sweeping.

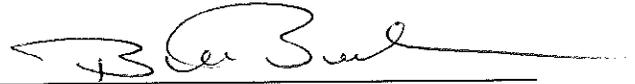
BMP 6.8: Flood Management Projects.

Measurable Goals. Undertake flood management projects within the purview of the Township's Public Works Department.

The DRSWD relies on the Township to undertake flood management projects within the Township right-of-way.

Section E. Certification.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel, properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who managed the system, or those persons directly responsible for gathering the information, information submitted is, to the best of my knowledge, true, accurate and complete. I am aware that there are significant penalties for submitted false information including the possibility of fine and imprisonment for known violations.



Deerfield Administrator

